

UNITED STATES DISTRICT COURT
for the
DISTRICT OF MASSACHUSETTS

VALDEMARAS CEINORIUS,)
VITALIJ CHRISONOPULO,)
FIODOR IGNATOV,)
VIKTOR KUZNECOV,)
ANATOLIJ MATVEJEV,)
NIKOLAJ NIKULIN,)
VALERIJ POTAPOV, and)
VLADIMIR ULJANOV,)
Plaintiffs)

V.)

ARTHUR FRANCO and)
JOHN G. HADAYIA,)
Defendants)

Civil Action

No. 03-CV-12270-RWZ

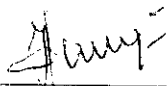
AFFIDAVIT OF NIKOLAJ NIKULIN

1. I am Nikolaj Nikulin, Gedminu Str. 8-45, Klaipeda, Lithuania.
2. From May 22, 2002 to September 24, 2002, I was a member of the crew of the Tug SEA GIANT.
3. I was not paid all of my wages for my service on the Tug SEA GIANT.
4. I am still owed \$9,049.17 in wages.
5. At the end of my service on the Tug SEA GIANT, the Defendant John G. Hadayia, on behalf of the vessel, signed and gave me a Guarantee Letter in which he, on behalf of the vessel, acknowledged this debt.
6. The original of this Guarantee Letter is attached as Exhibit A to this Affidavit.

SUBSCRIBED AND SWORN TO UNDER THE PAINS AND PENALTIES OF PERJURY

21st May, 2004

21st May, 2004
Date

 (NIKOLAJ NIKULIN)
Nikolaj Nikulin

AFFIDAVIT OF INTERPRETER

I certify that this affidavit was signed in my presence, that I correctly and accurately translated this affidavit from English into Russian, and that Nikolaj Nikulin acknowledged that he fully understood its contents and meaning.

SUBSCRIBED AND SWORN TO UNDER THE PAINS AND PENALTIES OF PERJURY

21st May, 2004

21 May 2004
Date

Liudvika Urbonavičiūtė
Interpreter – Ms. Liudvika Urbonavičiūtė
H. Manto str. 1, LT-5801 Klaipeda, Lithuania